

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

FANNIE MAE

Plaintiff,

v.

HATZ ONE LLC, et. al.,

Defendants.

:  
:  
:  
:  
:  
:  
:  
:

Case No. 1:24-cv-1606

Judge Bridget Meehan Brennan

**SUPPLEMENTAL DECLARATION OF LIEB STEINER F/K/A LEO GOLD IN  
SUPPORT OF REPLY TO FANNIE MAE’S SUPPLEMENTAL BRIEF IN SUPPORT  
OF MOTION TO APPOINT RECEIVER**

I, Lieb Steiner f/k/a Leo Gold – my Hebrew name, duly affirm and declare the following:

1. I am an employee of Aven Realty 1, LLC, a property management company owned by Mendel Steiner.

2. I have reviewed the Property Condition Assessment (“PCA”) as of “November 5, 2024” prepared by Armada Analytics and was present at its inspection of the Properties<sup>1</sup> on November 6-7, 2024. I was available to continue the inspection, as originally requested by representatives of Fannie Mae, on November 8, 2024; however, Jeremy Ellis of Armada Analytics said he was not returning to continue the inspection on November 8, 2024 and that I should contact Inna Holodniuk directly to arrange for a mutually convenient date. A copy of the email from Mr. Ellis to me dated November 8, 2024 is attached as **Exhibit 1** hereto.

3. I contacted Ms. Holodniuk via email on November 15, 2024 to try to set up another date but was never able to reach an agreement with her. Copies of my email exchanges to Ms. Holodniuk are attached as **Exhibit 2** hereto. It appears from our email exchanges that Ms. Holodniuk

---

<sup>1</sup> The Properties are identified by street name, parcel number and apartment name on Exhibit 1 to my Declaration in Support of Opposition to Plaintiff’s Emergency *Ex Parte* Motion for Immediate Appointment of Receiver filed at ECF No. 13-2.

was under the mistaken impression that we were unwilling to unlock locked and vacant units and was unaware that Armada Analytics had declined to return on the final inspection date of November 8, 2024 when previously locked and vacant units would have been more easily accessible.

4. Repairs and renovations are ongoing at the Properties. Prior to and following Armada Analysis's inspection of the Properties, I have supervised the following repairs, by building, in the categories listed as needing "immediate repair" or "critical" at Schedule 2.4 to the PCA, a copy of which is attached for convenience as **Exhibit 3** hereto:

A. Boilers:

- 2815 Ludlow Road/13300 Drexmore Road/2805 Ludlow Road – At date of inspection there was a Section 8 tenant. There is currently no one in occupancy in the building. Nonetheless, we will replace the boiler. I am awaiting a quote.
- 2622 North Moreland Boulevard – The heat is on in the building. I have given affected tenants space heaters and the option to transfer to another building pending final repairs to be scheduled no later than December 24, 2024.
- 2820 Ludlow Road/2835 South Moreland Boulevard – This tenant is moving out on December 31, 2024 and has not been in continual residency. Meanwhile, I have provided the tenant with a space heater.
- 2843 Hampton Road – This building is vacant. A technician from Gensco LLC provided a repair proposal to me on December 20, 2024 to remedy inadequate heat in the building. Meanwhile, I have caused the water to be shut down to prevent any damage to the premises.
- 2851 and 2859 South Moreland Boulevard – The radiator has been replaced and tenants had adequate heat thereafter. I have received no tenant complaints.

- 2870 South Moreland Boulevard – A technician from Gensco LLC provided a proposal to me on December 20, 2024 to replace the boiler. The sole tenant at the building is in the process of being relocated. A space heater was provided to the tenant in the interim.

B. Elevators:

- 2621 North Moreland Boulevard – The building has a working elevator. A copy of the City of Cleveland, Department of Building and Housing, Division of Code Enforcement, Certificate of Inspection stating that all requirements governing elevators have been met is attached as **Exhibit 4** hereto.
- 2880 South Moreland Boulevard – The building has a working elevator. A copy of the City of Cleveland, Department of Building and Housing, Division of Code Enforcement, Certificate of Inspection stating that all requirements governing elevators have been met is attached as **Exhibit 5** hereto.
- 2870 South Moreland Boulevard – I have contacted TKE Elevators daily to complete evaluation and schedule repairs. I have contacted Schindler Elevator as an alternative technician to finalize repairs in the event I do not get an adequate response from TKE Elevators shortly.
- 2635 North Moreland Boulevard – I have contacted TKE Elevators daily to complete evaluation and schedule repairs. I have contacted Schindler Elevator as an alternative technician to finalize repairs in the event I do not get an adequate response from TKE Elevators shortly.
- 2653 North Moreland Boulevard – I have contacted TKE Elevators daily to complete evaluation and schedule repairs. I have contacted Schindler Elevator as an alternative

technician to finalize repairs in the event I do not get an adequate response from TKE Elevators shortly.

- C. Down Units/Vacant Units – A status report of the renovation and reletting of down units and vacant units since the inspection is attached as **Exhibit 6** hereto.
- D. Garage Doors – Photographs taken at my instruction on December 20, 2024 of the garage doors at 2621 N. Moreland Boulevard, 13300 Drexmore Road, 2835 S. Moreland Boulevard, 2851 Hampton Road, 2859 Hampton Road and 2653 N. Moreland Road that have been repaired since the inspection are attached as **Consolidated Exhibit 7** hereto.
- E. Mailboxes – Photographs taken at my instruction on December 20, 2024 of the mailboxes at 2621 N. Moreland Boulevard, 2622 N. Moreland Boulevard, 13300 Drexmore Road, 2870 S. Moreland Boulevard, 2820 Ludlow Road, 2880 S. Moreland Boulevard, 2815 Ludlow Road, 2653 N. Moreland Boulevard, 2636 N. Moreland Boulevard, 2642 N. Moreland Boulevard, 2822 S. Moreland Boulevard, and 2635 N. Moreland Boulevard that have been repaired since the inspection are attached as **Consolidated Exhibit 8** hereto.
- F. Roof – An evaluation of the need for roof replacement versus interim repairs is under way, although there is no complaint of water intrusion from tenants at this time.
- G. Exterior Stairways – An evaluation of the need for exterior stairway replacement versus interim repairs is under way.

5. Further evidence of my continued and ongoing work to supervise repairs and renovations at the Properties, in particular, the Property located in the City of Shaker Heights is reflected in an email I received on November 19, 2024 from Chris Dieker, Assistant Director, Housing Department, City of Shaker Heights, which stated: “I just wanted to commend you... on the

work that you are doing to get these units looking in better shape... Keep up the good work.” A copy of the email from Chris Dieker dated November 19, 2024 is attached as **Exhibit 9** hereto.

Pursuant to 28 U.S.C. §1746, I, Lieb Steiner, duly affirm, certify, and declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, information, and belief.

Dated: December 20, 2024

  
\_\_\_\_\_  
Lieb Steiner